

**To:** Gallagher, Angela (DEP)[angela.gallagher@state.ma.us]  
**Cc:** Catri, Cindy[Catri.Cynthia@epa.gov]; Lombardo, Ginny[Lombardo.Ginny@epa.gov]; Tisa, Kimberly[Tisa.Kimberly@epa.gov]  
**Sent:** Mon 1/9/2017 5:18:44 PM  
**Subject:** RE: AVX Phase III Letter

Hi Angela,

Thank you for the opportunity to review MassDEP SERO's letter to AVX regarding its comments on the former Aerovox site Phase III RAP prior to sending out this letter. EPA is in general agreement with the comments provided in the letter and does not want to hold up the letter going out as soon as is feasible. There are a few additional comments we would like to share with you and are included below for your consideration:

1. EPA recommends that the state provide AVX thirty (30) days to submit a Phase III modification since discussions on MassDEP's concerns have taken place with AVX and its contractor at the December 8, 2016 meeting at your office.

2. In the Table presented on Pages 4 and 5 of the letter, should the MassDEP Determination for OU2-1 be Conditional Approval instead of Approved as discussed specifically on Page 6 where it is "Conditionally Approved?"

3. On Page 8 under OU3A, Comment No. 8, third sentence please note that EPA was not aware of the "DNAPL" conditions in the river until 2012 and on the Aerovox property until AVX notified MassDEP in April 2014. Recommend deleting "for many years" in the first part of this sentence. However, as you indicated in the latter part of the sentence, AVX had sufficient time to address EPA's proposed harbor dredging prior to it Phase III evaluations. In addition, please consider adding the following text to this paragraph:

"Further, the Phase III RAP presents no specific information on the required integration of remedial efforts along the boundary between Aerovox and the river. Given that the highest contaminant concentrations are found immediately landward of the existing sheet pile wall, containment needs to be provided directly along the existing boundary."

4. On Page 9 under OU3A, Comment No. 12, EPA suggests including a more explicit requirement that the Phase III Modification should include a comprehensive summary of all of the lines of evidence regarding DNAPL at the site – e.g. direct observations, MALM, concentrations in soil above threshold DNAPL saturation/partitioning, elevated groundwater concentrations relative to solubility, concentration trends with depth and over time, site use history. A tabular presentation provides an efficient summary of the

lines of evidence at various areas of the site. The culmination should be site maps presenting “confirmed” and “probable” DNAPL source zones following accepted characterization guidelines which can be found for instance in the 2009 Kuper Davies .

5. On Page 14 under General Comments Relative to EPA Dredging, EPA suggests reemphasizing the fact that the highest contaminant concentrations exist along this boundary.

**From:** Gallagher, Angela (DEP) [mailto:angela.gallagher@state.ma.us]  
**Sent:** Thursday, January 05, 2017 10:17 AM  
**To:** Lombardo, Ginny <Lombardo.Ginny@epa.gov>  
**Cc:** Stanley, Elaine <stanley.elainet@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>  
**Subject:** AVX Phase III Letter

Hi Ginny,

I am attaching the draft of the Phase III letter. We recognize that there are some stylistic issues, typos, format issues, and other technical questions we need to iron out, but for the sake of time, we wanted to make sure EPA has a chance to review. We don't expect that additional future changes to this letter will result in drastic changes to the version you are receiving.

I am attaching the Word version of the document, so please feel free to use the Review tool. It will make it easier for us to review EPA's comments.

Thanks,

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Angela Gallagher

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